

BEFORE THE DEPARTMENT OF TRANSPORTATION
OFFICE OF AVIATION ENFORCEMENT AND PROCEEDINGS
WASHINGTON, D.C.

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Naomi M. Horovitz)	
)	
v.)	Docket DOT-OST-2021-____
)	
Lufthansa)	
)	
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COMPLAINT OF NAOMI M. HOROVITZ

Comments with respect to this document should be addressed to:

Naomi M. Horovitz
(Redacted)

E-mail: naomihorovitz@gmail.com

Dated: 07/29/2021

BEFORE THE DEPARTMENT OF TRANSPORTATION
OFFICE OF AVIATION ENFORCEMENT AND PROCEEDINGS
WASHINGTON, D.C.

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Naomi M. Horovitz)	
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Lufthansa)	
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COMPLAINT OF NAOMI HOROVITZ

1. This complaint arises out of Lufthansa's non-compliance with their own conditions of carriage regarding consumers' right to be refunded for prepaid seat assignments that are reallocated to another seat category (Attachment 1, section 5.4.3). Furthermore, according to the Department's 2011 Final Rule on Enhancing Customer Protections (DOT-OST-2010-0140-2051), customers must be refunded optional fees (such as advance seat purchases) for any flights that are canceled. It follows logically that customers should also be refunded for optional fees for services that were never delivered by the airline. I spent \$470 on extra-legroom seats and advance seat assignments, and I did not receive any extra-legroom seats or any of the seat assignments that I paid for. I spent countless hours trying to access Lufthansa's customer service regarding this matter. I was hung up on and/or rebuffed at every attempt.

I. FACTS

A. Original booking, two cancellations, and changing seat assignments

2. On January 7, 2021, I used Chase Travel (frequent flyer points) to purchase two round-trip economy tickets from Chicago (ORD) to Nairobi (NBO) for myself (Naomi M. Horovitz) and my husband (Cezar Horovitz) (Booking #3ZO4P3; Attachment 2). Each flight had a layover in Frankfurt (FRA), resulting in four flights, or a total of eight seat assignments. As shown in Attachment 2, Chase was unable to issue seat assignments, and instead noted that “Seat choice is not guaranteed, please check with airline to confirm seat selection.”
3. On January 17, I went to the Lufthansa website to make seat selections. For two of the four flights, I paid for extra-legroom seats (\$100 X 2 flights X 2 people = \$400). For one of the flights, I paid for advance seat assignments \$35 X 2 people = \$70). For the fourth flight, advance seating was unavailable. My total purchase was \$470. This purchase is documented in attachments 3-9. The email from Lufthansa (attachment 3) states that “You have booked an additional service” and clearly shows seat assignments where there were none before (Flight 1: 27C, 27B; Flight 2: 32C, 32A; Flight 3: 30C, 30A; Flight 4: None). I am also attaching the six receipts from Lufthansa showing that I paid a total of \$470 for seat reservations (attachments 4-9). Because of Lufthansa’s lack of transparency, I never received a seat map or any other proof that I was to receive extra-legroom seats. I simply took it on good faith that I would receive the seats that I paid for.

4. On March 26, I noticed that one of my flights had been cancelled (flight LH 591 from Nairobi to Frankfurt) without Lufthansa notifying me. Fortunately, I was able to get through to the customer service phone line, and Lufthansa rebooked me and my husband on the same flight as before, at the same time (I am still unsure why we got cancelled in the first place). When the ticket was reissued, our seat assignments for that flight disappeared (see attachment 10). The other two sets of seat assignments were still on the ticket.
5. On June 10, I realized that some of our seat assignments were missing, and I made numerous attempts by phone (800-645-3880) and chat to contact customer service about this problem (attachments 20-21). I became very frustrated with the near-impossibility of talking to a human customer service agent. As you can see from the attached call logs, some of my phone calls never went through at all: I merely received a message that “all lines are busy” and was disconnected.
6. In desperation, I searched the internet for an alternative phone number for Lufthansa’s customer service, and I landed on a Yelp page that offered several Lufthansa customer service phone numbers (attachment 25). I called one of these phone numbers, which I now realize was a scammer. I gave them my booking code, and when they demanded more money and I refused, they cancelled my flight completely using the Lufthansa website (attachment 26).
7. In further desperation, I continued to call the legitimate Lufthansa phone number until I actually got through. After one disconnection, another attempt by phone, and another attempt by chat, I was able to restore my reservation

and my seat assignments, but as shown in attachment 11 they were different seat assignments (Flight 1: 27B, 27C; Flight 2: 22E, 22D; Flight 3: 30K, 30H; Flight 4: none). I do not speak German, but I believe this document states that my seats were “confirmed.” I was reassured by customer service that these would still be extra-legroom seats on the flights for which I had paid for them. I believed them.

8. I also attempted to contact Lufthansa “executive customer service” via email on June 10, but the only replies I ever received were two form letters without offering any attempt at actual assistance (attachments 27-28).
9. On July 6, we checked in for our flights, only to find out that our seat assignments had completely changed again, and that they had changed to seats without any extra legroom (see attachments 12-19). As you can see from the attached boarding passes, our actual seat assignments were: Flight 1: 36B, 36C; Flight 2: 35A, 35C; Flight 3: 41D, 41E; Flight 4: 35K, 35J). All of these seats were basic economy with no extra legroom, as shown in several sample photos of our knees almost touching the seats in front of us (attachments 29-32). The extra-legroom seats on those flights were mostly given to families of babies and toddlers, with bassinets attached to the walls (attachments 33-34). While I think the bassinet idea is a good one, I don’t think it should happen on my dime. Furthermore, since I never received ANY of the seat assignments that I paid for, I believe that I should receive a refund for both the extra-legroom AND advance seat reservation fees (\$470 total).

B. My attempts to reason with Lufthansa agents during the trip itself

10. On July 7, when we checked in for our flight at O'Hare airport (ORD), my husband and I tried to explain the situation to our gate agent. She replied that the flight was completely full and she could not change our seats, and also that we did not have any proof that we had paid for extra-legroom (see #A3 above regarding Lufthansa's receipts and lack of transparency). At this point I gave up on getting my seat assignments and started asking for a refund. She suggested that we either call the Lufthansa customer service phone number (which I already knew from prior experience was a complete waste of time), or wait in line for the Lufthansa customer service desk at O'Hare. She further stated that she was not authorized to give any refunds.
11. When we spoke to two agents at the Lufthansa customer service desk at O'Hare, they essentially said that "Lufthansa doesn't give refunds." They also clearly stated that they do not work for Lufthansa; they are merely contractors and therefore not authorized to issue refunds. I was again given a business card with the same customer service phone number on it (which I had already learned was useless).
12. During my flight home on July 26, I attempted to speak to a Lufthansa customer service agent in Frankfurt, but the customer service desk was completely closed (see attachment 35). There were no other customer service desks within reasonable walking distance.

C. Lufthansa's refund policy for optional services

13. According to their conditions of carriage (#5.4.3): "We reserve the right to assign or reassign seats at any time, even after boarding of the aircraft. This

may be necessary for operational, safety or security reasons. If you purchased an Advance Seat Reservation and the flight is cancelled, or if seat changes are made by us for operational, safety, or security reasons we will refund the amount you paid for the seat reservation if your desired seat category is not available.” Therefore, I am clearly due a refund, which Lufthansa has failed and/or refused to issue to me on multiple occasions. I do not wish to waste any more of my valuable time attempting to call them on the phone.

D. Lufthansa’s obligations

14. Lufthansa is an airline that is authorized to operate flights from and to the United States and is therefore subject to the Department’s jurisdiction and bound by their rules, which apply to U.S. and foreign airlines operating flights from, to and within the United States.
15. According to the Department’s 2011 Final Rule on Enhancing Customer Protections (DOT-OST-2010-0140-2051), customers must be refunded optional fees (such as advance seat purchases) for any flights that are canceled. It follows logically that customers should also be refunded for optional fees for services that were never delivered by the airline.

E. Lufthansa’s non-compliance and violations

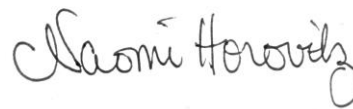
16. Lufthansa’s failure to issue prompt refunds for optional services not delivered, is in violation of its obligations and of the consumers right to be refunded as per the rules detailed in the Department’s 2011 Final Rule on Enhancing Customer Protections.

II. REQUESTED RESOLUTION

17. I ask that the Department of Transportation:

- (1) Exercise its authority under 49 USC 41712 to open an investigation of Lufthansa for its non-compliance with the Department's 2011 Final Rule on Enhancing Customer Protections, as well as its own contract of carriage;
- (2) Order Lufthansa to comply with its obligation to promptly refund passengers for optional services not delivered, regardless of the reason of such non-delivery of services.
- (3) Order Lufthansa to review with its personnel, including reservationists, ticket counter agents, refund personnel, and other customer service professionals, the circumstances under which refunds should be made. The cavalier manner in which Lufthansa took my money, shifted my seats around multiple times, failed to offer any customer service at all, and refused my requests for refunds, suggests that there are many other customers in my situation who have simply given up.
- (4) Impose appropriate civil penalties on Lufthansa.

Respectfully submitted,

A handwritten signature in cursive script that reads "Naomi Horovitz". The signature is written in dark ink and is positioned to the left of a vertical line.

Naomi M. Horovitz

Attachment 1: Lufthansa's Contract of Carriage, #5.4.3

General Conditions of Carriage (Passenger and Baggage)


Frankfurt, June 2021

Publisher:


Deutsche Lufthansa Aktiengesellschaft

5.4.3 We reserve the right to assign or reassign seats at any time, even after boarding of the aircraft. This may be necessary for operational, safety or security reasons. If you purchased an Advance Seat Reservation and the flight is cancelled, or if seat changes are made by us for operational, safety, or security reasons we will refund the amount you paid for the seat reservation if your desired seat category is not available. If you cancel or rebook your ticket or purchase an upgrade or have made incorrect statements on your ability to sit on emergency exit seats the amount paid for the seat reservation will not be refunded.

Attachment 2: Original Chase Booking


 **Departure** Thu, Jul 8

Lufthansa 431


Chicago (ORD) 4:00pm Terminal: 1	 Frankfurt (FRA) 7:20am +1 day Terminal: 1 Arrives on Jul 9, 2021
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Cabin: Economy / Coach (L)
8h 20m duration

Note: Seat choice is not guaranteed, please check with airline to confirm seat selection.


 3h 50m stop Frankfurt (FRA)

Lufthansa 590

Frankfurt (FRA) 11:10am Terminal: 1	 Nairobi (NBO) 8:10pm
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Cabin: Economy / Coach (L)
8h duration

Note: Seat choice is not guaranteed, please check with airline to confirm seat selection.

 **Return** Sun, Jul 25

Lufthansa 591

Nairobi (NBO)



Frankfurt (FRA)


3

10:25pm

5:40am **+1 day**
Terminal: 1
Arrives on Jul 26, 2021

Cabin: Economy / Coach (L)
8h 15m duration

Note: Seat choice is not guaranteed, please check with airline to confirm seat selection.

 2h 55m stop Frankfurt (FRA)

Lufthansa 9152 operated by UNITED AIRLINES

Frankfurt (FRA)

8:35am

Terminal: 1



Chicago (ORD)

10:45am

Terminal: 5

Cabin: Economy / Coach (L)
9h 10m duration


Note: Seat choice is not guaranteed, please check with airline to confirm seat selection.

Attachment 3: First set of seat assignments (3/26)

Booking details

Lufthansa booking code: **3ZO4P3**

[Display/edit booking](#)



Lufthansa Service Center

Phone: USA: 1-800-645-3880 Canada: 1-800-563-5954

URL: [lufthansa.com](https://www.lufthansa.com)

Passenger information

HOROVITZ/NAOMI	HOROVITZ/CEZAR
Ticket number: 2202459901459	Ticket number: 2202459901458

Receipt and Additional documents

Do you require receipts for your tax returns or your travel expenses? You will be able to access all the receipts at the end of this message.

[Download your receipts now](#)


Option for download is valid up to 90 days after end of travel.

Your itinerary

Thu. 08 July 2021: Chicago – Frankfurt

Important Notices

- Due to stricter security checks for flights from the US it is advisable to be at the airport about 2 hours prior to departure.
- You have successfully booked a seat character. The seat may change due to unscheduled change of aircraft. For terms and conditions of your seat reservation please click [here](#).

16:00 h	Chicago OHare Intl Apt (ORD) Terminal 1	 LH 431
07:20 h +1	Frankfurt Frankfurt (FRA) Terminal 1	operated by: Lufthansa

Status: confirmed	Seats: 27C, 27B	Class: Economy Class (L)
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Lufthansa

Fri. 09 July 2021: Frankfurt – Nairobi

Important Notice

You have successfully booked a seat character. The seat may change due to unscheduled change of aircraft. For terms and conditions of your seat reservation please click [here](#).

11:10 h Frankfurt Frankfurt (FRA)
Terminal 1
20:10 h Nairobi Jomo Kenyatta Intl (NBO)

LH 590
operated by:
Lufthansa

Status: confirmed

Seats: 32C, 32A

Class: Economy Class (L)

Sun. 25 July 2021: Nairobi – Frankfurt

22:25 h Nairobi Jomo Kenyatta Intl (NBO)
05:40 h +1 Frankfurt Frankfurt (FRA)
Terminal 1

LH 591
operated by:
Lufthansa

Status: confirmed

Class: Economy Class (V)

Mon. 26 July 2021: Frankfurt – Chicago

Important Notice

Due to stricter security checks for flights to the US it is advisable to be at the airport about 2 hours prior to departure. For further information please refer to the official website of TSA (Transport Security Administration, English only).

10:45 h Frankfurt Frankfurt (FRA)
Terminal 1
13:00 h Chicago OHare Intl Apt (ORD)
Terminal 5

LH 430
operated by:
Lufthansa

Status: confirmed

Class: Economy Class (V)

Attachments 4-9: Receipts for first set of seat assignments

Passenger Receipt

Electronic Miscellaneous Document 2201871765642



Lufthansa

Please print this receipt and retain throughout your journey.
Bitte drucken Sie diesen Beleg aus und führen ihn bei Ihrer Reise mit.

Travel data for/Reisedaten für: HOROVITZ / NAOMI (ADT)
Booking reference/Buchungscode: 3ZO4P3
Document number/Dokumentenummer: 2201871765642

Details/Beschreibung:

Air Transportation

Reason of issuance/Verwendungszweck:	Seat Reservation	
Coupon	From/Von:	To/Nach:
1	FRA	NBO

Issued in connection with/Ausgestellt in Verbindung mit: 2207563700958

Fare details/Preisberechnung:

Fare/Tarif: USD 35.00
Taxes/Steuern und Gebühren:
Total/Total: USD 35.00
GRENZUEBERSCHREITENDE BEFOERDERUNG VON PERSONEN IM LUFTVERKEHR PAR. 26 (3) USTG

Payment details/Zahlungsinformationen:

Form of Payment/Bezahlung: Credit Card Visa

Validating data/Ausstellungsdaten:

Issued by/Ausgestellt durch: LUFTHANSA
Date of issue/Ausstellungsdatum: 17JAN21
Place of issue/Austellungsort: UNITED STATES

Important Notice/Wichtiger Hinweis:

For this air travel the Montreal Convention or the Warsaw Convention may be applicable and these Conventions limit the liability of carriers in respect of loss of or damage to baggage and for delay. In the case of death or bodily injury no financial limits apply under the Montreal Convention and for European Community carriers; for damage up to the equivalent of 113.100 Special Drawing Rights (SDR) carriers are liable regardless of negligence. Carriage on Lufthansa German Airlines is subject to its conditions of carriage, tariff and other conditions.

Diese Flugreise kann dem Montrealer Übereinkommen oder dem Warschauer Abkommen unterliegen, die die Haftung des Luftfrachtführers für Verlust oder Beschädigung von Gepäck und für Verspätungen beschränken. Für Tod und Körperverletzung gelten nach dem Montrealer Übereinkommen und für die Luftfahrtunternehmen der Europäischen Gemeinschaft keine Haftungsgrenzen und entfällt für Schäden bis zu einem 113.100 Sonderziehungsrechte (SZR)entsprechenden Betrag der Einwand fehlenden Verschuldens. Beförderung mit der Deutschen Lufthansa unterliegt deren Beförderungs-, Tarif- und sonstigen Bedingungen.

Passenger Receipt

Electronic Miscellaneous Document 2201871765640



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Travel data for/Reisedaten für:

Booking reference/Buchungscode: 3ZO4P3
Document number/Dokumentennummer: 2201871765640

Details/Beschreibung:

Reason of issuance/Verwendungszweck:	Seat Reservation	
Coupon	From/Von:	To/Nach:
1	NBO	FRA

Issued in connection with/Ausgestellt in Verbindung mit: 2202459901458

Fare details/Preisberechnung:

Fare/Tarif:	USD 100.00
Taxes/Steuern und Gebühren:	
Total/Total:	USD 100.00

GRENZUEBERSCHREITENDE BEFOERDERUNG VON PERSONEN IM LUFTVERKEHR PAR. 26 (3) USTG

Payment details/Zahlungsinformationen:

Form of Payment/Bezahlung:	Credit Card Visa
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Validating data/Ausstellungsdaten:

Issued by/Ausgestellt durch:	LUFTHANSA
Date of issue/Ausstellungsdatum:	17JAN21
Place of issue/Austellungsort:	UNITED STATES

Important Notice/Wichtiger Hinweis:

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Passenger Receipt

Electronic Miscellaneous Document 2201871765644



Lufthansa

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Travel data for/Reisedaten für: HOROVITZ / NAOMI (ADT)
Booking reference/Buchungscode: 3ZO4P3
Document number/Dokumentnummer: 2201871765644

Details/Beschreibung:

Air Transportation

Reason of issuance/Verwendungszweck:	Seat Reservation	
Coupon	From/Von:	To/Nach:
1	ORD	FRA

Issued in connection with/Ausgestellt in Verbindung mit: 220245@901459

Fare details/Preisberechnung:

Fare/Tarif:	USD 100.00
Taxes/Steuern und Gebühren:	
Total/Total:	USD 100.00
GRENZUEBERSCHREITENDE BEFOERDERUNG VON PERSONEN IM LUFTVERKEHR PAR. 26 (3) USTG	

Payment details/Zahlungsinformationen:

Form of Payment/Bezahlung:	Credit Card Visa
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Validating data/Ausstellungsdaten:

Issued by/Ausgestellt durch:	LUFTHANSA
Date of issue/Ausstellungsdatum:	17JAN21
Place of issue/Austellungsort:	UNITED STATES

Important Notice/Wichtiger Hinweis:

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Electronic Miscellaneous Document 2201871765641



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Travel data for/Reisedaten für:

Booking reference/Buchungscode: 3ZO4P3
Document number/Dokumentnummer: 2201871765641

Details/Beschreibung:

Reason of issuance/Verwendungszweck:	Seat Reservation	
Coupon	From/Von:	To/Nach:
1	NBO	FRA

Issued in connection with/Ausgestellt in Verbindung mit: 2202459901459

Fare details/Preisberechnung:

Fare/Tarif: USD 100.00
Taxes/Steuern und Gebühren:
Total/Total: USD 100.00
GRENZUEBERSCHREITENDE BEFOERDERUNG VON PERSONEN IM LUFTVERKEHR PAR. 26 (3) USTG

Payment details/Zahlungsinformationen:

Form of Payment/Bezahlung: Credit Card Visa

Validating data/Ausstellungsdaten:

Issued by/Ausgestellt durch: LUFTHANSA
Date of issue/Ausstellungsdatum: 17JAN21
Place of issue/Austellungsort: UNITED STATES

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Passenger Receipt

Electronic Miscellaneous Document 2201871765643



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Travel data for/Reisedaten für:

Booking reference/Buchungscode: 3ZO4P3
Document number/Dokumentnummer: 2201871765643

Details/Beschreibung:

Reason of issuance/Verwendungszweck:	Seat Reservation	
Coupon	From/Von:	To/Nach:
1	FRA	NBO

Issued in connection with/Ausgestellt in Verbindung mit: 2202459901458

Fare details/Preisberechnung:

Fare/Tarif:	USD 35.00
Taxes/Steuern und Gebühren:	
Total/Total:	USD 35.00

GRENZUEBERSCHREITENDE BEFOERDERUNG VON PERSONEN IM LUFTVERKEHR PAR. 26 (3) USTG

Payment details/Zahlungsinformationen:

Form of Payment/Bezahlung:	Credit Card Visa
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Validating data/Ausstellungsdaten:

Issued by/Ausgestellt durch:	LUFTHANSA
Date of issue/Ausstellungsdatum:	17JAN21
Place of issue/Austellungsart:	UNITED STATES

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Passenger Receipt

Electronic Miscellaneous Document 2201871765645



Lufthansa

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Travel data for/Reisedaten für:
Booking reference/Buchungscode: 3Z04P3
Document number/Dokumentnummer: 2201871765645

Details/Beschreibung:

Reason of issuance/Verwendungszweck:	Seat Reservation	
Coupon	From/Von:	To/Nach:
1	ORD	FRA
Issued in connection with/Ausgestellt in Verbindung mit: 2202450001458		

Fare details/Preisberechnung:

Fare/Tarif:	USD 100.00
Taxes/Steuern und Gebühren:	
Total/Total:	USD 100.00
GRENZUEBERSCHREITENDE BEFOERDERUNG VON PERSONEN IM LUFTVERKEHR PAR. 26 (3) USTG	

Payment details/Zahlungsinformationen:

Form of Payment/Bezahlung:	Credit Card Visa
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Validating data/Ausstellungsdaten:

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Important Notice/Wichtiger Hinweis:

For this air travel the Montreal Convention or the Warsaw Convention may be applicable and these Conventions limit the liability of carriers in respect of loss of or damage to baggage and for delay. In the case of death or bodily injury no financial limits apply under the Montreal Convention and for European Community carriers; for damage up to the equivalent of 113.100 Special Drawing Rights (SDR) carriers are liable regardless of negligence. Carriage on Lufthansa German Airlines is subject to its conditions of carriage, tariff and other conditions.


Diese Flugreise kann dem Montrealer Übereinkommen oder dem Warschauer Abkommen unterliegen, die die Haftung des Luftfrachtführers für Verlust oder Beschädigung von Gepäck und für Verspätungen beschränken. Für Tod und Körperverletzung gelten nach dem Montrealer Übereinkommen und für die Luftfahrtunternehmen der Europäischen Gemeinschaft keine Haftungsgrenzen und entfällt für Schäden bis zu einem 113.100 Sonderziehungsrechte (SZR)entsprechenden Betrag der Einwand fehlenden Verschuldens. Beförderung mit der Deutschen Lufthansa unterliegt deren Beförderungs-, Tarif- und sonstigen Bedingungen.

Attachment 10: Second set of seat assignments (6/10)

Buchungsdetails

Lufthansa Buchungscode: **3ZO4P3**

[Buchung anzeigen / bearbeiten](#)



Lufthansa Service Center

Telefon: +49 (0) 69 86 799 799

URL: [lufthansa.com](https://www.lufthansa.com)

Passagierinformationen

HOROVITZ/NAOMI Ticketnummer: 2202459901459	HOROVITZ/CEZAR Ticketnummer: 2202459901458
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Rechnungsbelege und zusätzliche Dokumente

Benötigen Sie Belege für Ihre Steuerunterlagen oder Ihre Reisekostenabrechnung? Sie finden den Zugriff auf sämtliche Belege am unteren Ende dieser Benachrichtigung.

↓ [Laden Sie jetzt Ihre Belege herunter](#)


Downloadmöglichkeit verfällt 90 Tage nach Beendigung der Reise

Ihr Reiseverlauf

Do. 08. Juli 2021: Chicago – Frankfurt/Main

Wichtige Hinweise

- Aufgrund von verstärkten Sicherheitskontrollen bei Flügen beginnend in den USA wird empfohlen, bereits 2 Stunden vor Abflug am Flughafen zu sein.
- Bitte beachten Sie, dass für Ihre bestätigten Sitzplatzreservierungen zusätzliche Kosten anfallen. Eine entsprechende Übersicht finden Sie hier.

16:00 Uhr	Chicago OHare Intl Apt (ORD) Terminal 1	 LH 431
		durchgeführt von: Lufthansa
07:20 Uhr +1	Frankfurt/Main Frankfurt (FRA) Terminal 1	

Status: bestätigt	Sitzplätze: 27B, 27C	Klasse: Economy Class (L)
--------------------------	-----------------------------	----------------------------------



Fr. 09. Juli 2021: Frankfurt/Main – Nairobi

Wichtiger Hinweis

Bitte beachten Sie, dass für Ihre bestätigten Sitzplatzreservierungen zusätzliche Kosten anfallen. Eine entsprechende Übersicht finden Sie hier.

11:10 Uhr Frankfurt/Main Frankfurt (FRA)
Terminal 1
20:10 Uhr Nairobi Jomo Kenyatta Intl (NBO)

LH 590
durchgeführt von:
Lufthansa

Status: bestätigt

Sitzplätze: 22E, 22D

Klasse: Economy Class (L)

So. 25. Juli 2021: Nairobi – Frankfurt/Main

Wichtiger Hinweis

Bitte beachten Sie, dass für Ihre bestätigten Sitzplatzreservierungen zusätzliche Kosten anfallen. Eine entsprechende Übersicht finden Sie hier.

22:25 Uhr Nairobi Jomo Kenyatta Intl (NBO)
05:40 Uhr +1 Frankfurt/Main Frankfurt (FRA)
Terminal 1

LH 591
durchgeführt von:
Lufthansa

Status: bestätigt

Sitzplätze: 30K, 30H

Klasse: Economy Class (V)

Mo. 26. Juli 2021: Frankfurt/Main – Chicago

Wichtiger Hinweis

Aufgrund von verstärkten Sicherheitskontrollen bei Flügen in die USA wird empfohlen, bereits 2 Stunden vor Abflug am Flughafen zu sein. Weitere Informationen finden Sie auf der Internetseite der TSA (Transport Security Administration, English only).


10:45 Uhr Frankfurt/Main Frankfurt (FRA)
Terminal 1
13:00 Uhr Chicago OHare Intl Apt (ORD)
Terminal 5

LH 430
durchgeführt von:
Lufthansa

Status: bestätigt

Klasse: Economy Class (V)


Attachment 11: Third set of seat assignments (6/21)

**Lufthansa**

You have booked an additional service

Lufthansa booking code: 3ZO4P3

[Display/edit booking](#)



Lufthansa Service Center
Phone: 1 800 111 02 273
URL: [lufthansa.com](https://www.lufthansa.com)

Passenger information


HOROVITZ/NAOMI Ticket number: 2202459901459	HOROVITZ/CEZAR Ticket number: 2202459901458
---	---

Receipt and Additional documents

Do you require receipts for your tax returns or your travel expenses? You will be able to access all the receipts at the end of this message.

↓ [Download your receipts now](#)


Option for download is valid up to 90 days after end of travel.

 **Your itinerary**

Thu. 08 July 2021: Chicago – Frankfurt

Important Notices

- Due to stricter security checks for flights from the US it is advisable to be at the airport about 2 hours prior to departure.
- Please note that additional charges apply for your confirmed seat reservations. A respective overview can be found [here](#).

16:00 h	Chicago OHare Intl Apt (ORD) Terminal 1	 LH 431 operated by: Lufthansa
07:20 h +1	Frankfurt Frankfurt (FRA) Terminal 1	

Status: confirmed	Seats: 27C, 27B	Class: Economy Class (L)
--------------------------	------------------------	---------------------------------



Lufthansa

Fri. 09 July 2021: Frankfurt – Nairobi

Important Notice

Please note that additional charges apply for your confirmed seat reservations. A respective overview can be found [here](#).

11:10 h Frankfurt Frankfurt (FRA)
Terminal 1
20:10 h Nairobi Jomo Kenyatta Intl (NBO)



LH 590
operated by:
Lufthansa

Status: confirmed

Seats: 32C, 32A

Class: Economy Class (L)

Sun. 25 July 2021: Nairobi – Frankfurt

Important Notice

Please note that additional charges apply for your confirmed seat reservations. A respective overview can be found [here](#).

22:25 h Nairobi Jomo Kenyatta Intl (NBO)
05:40 h +1 Frankfurt Frankfurt (FRA)
Terminal 1



LH 591
operated by:
Lufthansa

Status: confirmed

Seats: 30K, 30H

Class: Economy Class (V)

Mon. 26 July 2021: Frankfurt – Chicago

Important Notice

Due to stricter security checks for flights to the US it is advisable to be at the airport about 2 hours prior to departure. For further information please refer to the official website of TSA (Transport Security Administration, English only).

10:45 h Frankfurt Frankfurt (FRA)
Terminal 1
13:00 h Chicago OHare Intl Apt (ORD)
Terminal 5

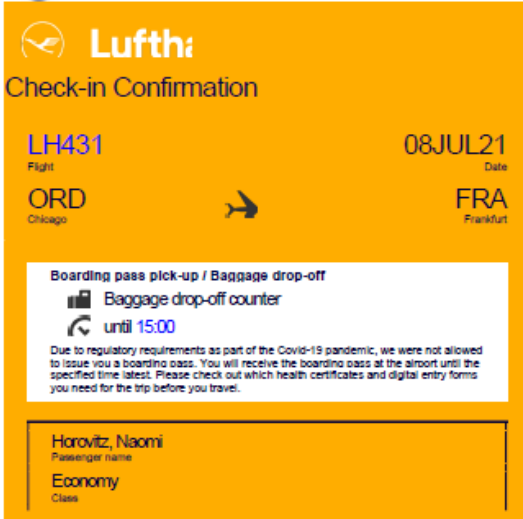


LH 430
operated by:
Lufthansa

Status: confirmed

Class: Economy Class (V)

Attachments 12-19: Actual seat assignments (boarding passes)



Lufthansa
Check-in Confirmation

LH431 Flight **08JUL21** Date

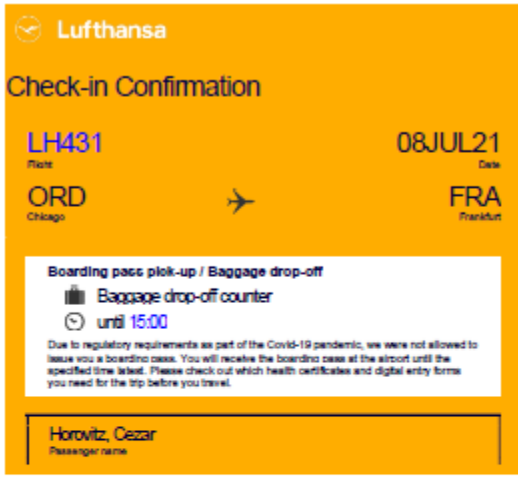
ORD Chicago **FRA** Frankfurt

Boarding pass pick-up / Baggage drop-off
Baggage drop-off counter
until **15:00**

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Naomi
Passenger name
Economy
Class

— Status	34 Sec. no.	36C Seat
B17 Gate	15:30 Boarding	



Lufthansa
Check-in Confirmation

LH431 Flight **08JUL21** Date


ORD Chicago **FRA** Frankfurt

Boarding pass pick-up / Baggage drop-off
Baggage drop-off counter
until **15:00**

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.


Horovitz, Cezar
Passenger name



Economy Class	— Status	24 Sec. no.	36B Seat
B17 Gate	15:30 Boarding		

 **Lufthansa**

Check-in Confirmation

LH590 Flight **09JUL21** Date

FRA Frankfurt  **NBO** Nairobi

Boarding pass pick-up / Baggage drop-off
 Baggage drop-off kiosk or counter
 until **10:10**

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Naomi
Passenger name

Economy
Class

1

— Status	8 Sec. no.	35C Seat
-------------	---------------	-------------

B23 Date	09:10 Boarding
--------------------	--------------------------

 **Lufthansa**

Check-in Confirmation

LH590 Flight **09JUL21** Date

FRA Frankfurt  **NBO** Nairobi

Boarding pass pick-up / Baggage drop-off
 Baggage drop-off kiosk or counter
 until **10:10**


Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Cezar
Passenger name

1

Economy Class	7 Sec. no.	35A Seat
------------------	---------------	-------------

B23 Date	09:10 Boarding
--------------------	--------------------------


 **Lufthansa**

Check-in Confirmation

LH591
Flight


25JUL21
Date


NBO
Nairobi



FRA
Frankfurt

Boarding pass pick-up / Baggage drop-off

 Check-in counter

 until 20:25

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Naomi
Passenger name

Economy
Class

—
Status

78
Sec. no.

41D
Seat

....
Gate


21:00
Boarding

Check-in Confirmation

LH591
Flight


25JUL21
Date


NBO
Nairobi



FRA
Frankfurt

Boarding pass pick-up / Baggage drop-off

 Check-in counter

 until 20:25

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Cezar
Passenger name

Economy
Class


—
Status

79
Sec. no.

41E
Seat

1

26 of 39


 **Lufthansa**

Check-in Confirmation

LH430
Flight


26JUL21
Date


FRA
Frankfurt



ORD
Chicago

Boarding pass pick-up / Baggage drop-off

 Baggage drop-off kiosk or counter

 until 09:45

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Naomi
Passenger name

Economy
Class

—
Status

25
Sec. no.

35K
Seat

Gate

10:05
Boarding

 **Lufthansa**

Check-in Confirmation

LH430
Flight

26JUL21
Date

FRA
Frankfurt



ORD
Chicago

Boarding pass pick-up / Baggage drop-off

 Baggage drop-off kiosk or counter

 until 09:45

Due to regulatory requirements as part of the Covid-19 pandemic, we were not allowed to issue you a boarding pass. You will receive the boarding pass at the airport until the specified time latest. Please check out which health certificates and digital entry forms you need for the trip before you travel.

Horovitz, Cezar
Passenger name

Economy
Class

—
Status

26
Sec. no.

35J
Seat

1

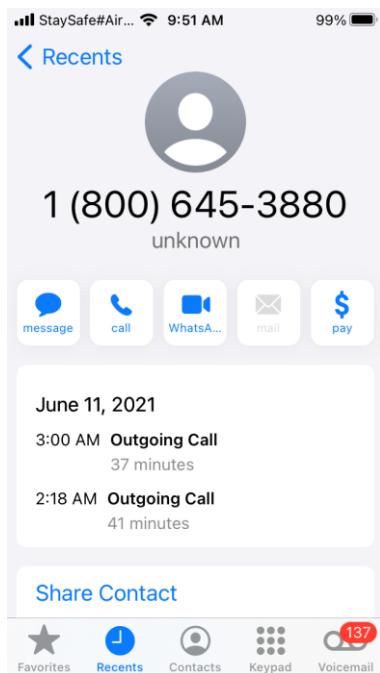
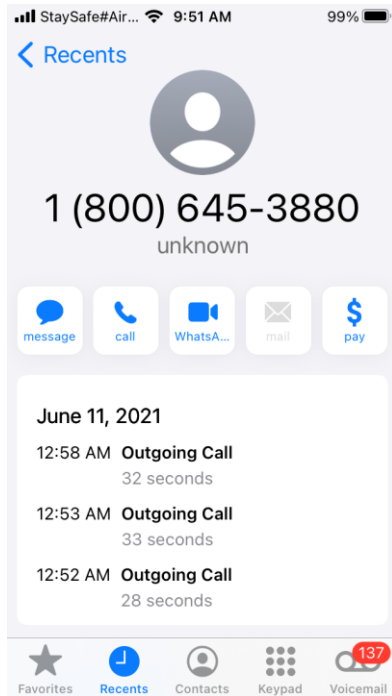
Gate

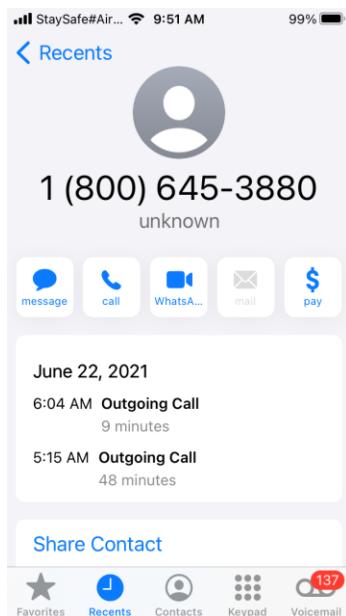
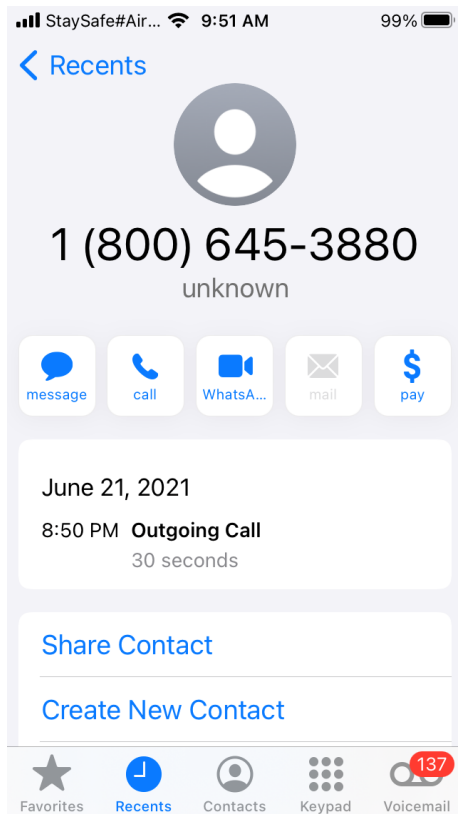
10:05
Boarding

27 of 39

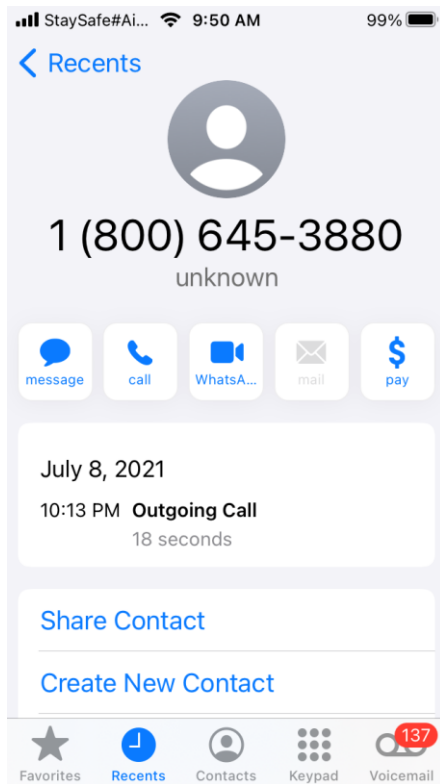
Attachments 20-24: Sample call logs from my numerous attempts to contact

Lufthansa customer service line. The calls that are less than one minute long are calls in which I received the message “all lines are busy” and was immediately disconnected. I also made numerous attempts in the chat and in person. Note that the dates and times are indicated in Nairobi time (8 hours ahead of Chicago time), because I took the photos while in Nairobi.






Naomi Horovitz
Complaint – Lufthansa




Attachment 25: Fake Lufthansa phone numbers posted on Yelp’s Lufthansa page by scammers



Fernendis D.
Financial District, New York, NY
📍 0 🌟 8

...



7/29/2021


Lufthansa Customer Service Phone Number +1--808-800~{9936} Good Airline, impeccable service and good hygiene rules! I had to travel to get home during the COVID-19 situation, and they really made me feel safe. I was worried before the flight, but they did a great job. If I would have to fly again in this times I would try to do it with Lufthansa, because what I have seen and heard from other airlines did not compare the security level they had!

They even left space between each travel group, so there were always some seats between every group that was traveling together. Putting safety first and not profit is worth mentioning and five stars!

Lufthansa Support number +1--808-800~{9936} (Toll-Free) . Get Upto 40 % Discount on Flight Booking.We had a great experience with Lufthansa on our trip to Thailand. We upgraded to premium economy. I have read some misconceptions about the difference of Premium economy . I've heard people say economy plus is not worth the upgrade as the only difference from regular economy is 4 inches of leg room. Lufthansa premium economy is more like the old business class with an extendable foot rest, 20 seat private cabin section, warm washcloth to freshen up, champagne, better cuisine, larger TV screens, free drinks, and better service.


Lufthansa phone number +1--808-800~{9936}

Attachment 26: Cancellation of flight by scammers (see attachment 25 above)

 **Lufthansa**

Cancellation acknowledgement

Lufthansa booking code: 3ZO4P3




Important Notices

- If your ticket fare allows any refunds, the amount will be calculated and recredited to your account. If an administrative fee applies, this will be debited to your account separately.
- Your flights have been cancelled. For a possible refund, please contact the travel agency that issued the ticket.

Passenger information


HOROVITZ/NAOMI Ticket number: 2202459901459	HOROVITZ/CEZAR Ticket number: 2202459901458
---	---

 **Your itinerary**

Thu. 08 July 2021: Chicago – Frankfurt

Important Notices

- Due to stricter security checks for flights from the US it is advisable to be at the airport about 2 hours prior to departure.
- You have successfully booked a seat character. The seat may change due to unscheduled change of aircraft. For terms and conditions of your seat reservation please [click here](#).

16:00 h	Chicago OHare Intl Apt (ORD) Terminal 1	 LH 431 operated by: Lufthansa
07:20 h +1	Frankfurt Frankfurt (FRA) Terminal 1	

Status: cancelled	Class: Economy Class (L)
--------------------------	---------------------------------

32 of 39

Attachment 27: When I attempted to reach out to “executive customer service” via email, I received a form letter (with no actual assistance)

Naomi Mandel

From: Lufthansa Customer Relations <customer.relations@lufthansa.com>
Sent: Friday, June 11, 2021 3:54 AM
To: Naomi Mandel
Subject: Your Feedback to Lufthansa, FB ID 34989700

Dear passenger,

Thank you for your request, which we have already handed over to our service team with the reference number (Feedback ID 34989700).

We ask for your understanding that responses are currently delayed due to the extraordinarily high volume of incoming inquiries. You can support us by refraining from further inquiries. We assure you that every feedback received will be processed and you will be contacted as soon as possible. However, inquiries about flights taking place in the next few days will probably not be answered in time.

For assistance with upcoming flights or to have your flight rebooked by Lufthansa, please visit <https://www.lufthansa.com/de/en/extended-rebooking-options> for further guidance on how to proceed.

We thank you for your understanding and cooperation

With kindest regards

Your Lufthansa customer relations team

For your information:

- Please make sure to always include our eight digit Feedback ID if you are answering to our correspondence. You can find the Feedback ID in the subject of this email.
- For attachments please note the following restrictions: max. 6 each 2MB in size, allowed formats: .pdf, .jpg, or .jpeg.

Lufthansa German Airlines | Customer Relations | P.O. Box 710234 | 60492 Frankfurt/Main | Germany

Email customer.relations@lufthansa.com

Attachment 28: A month later, I received a second form letter (with no actual assistance).

Naomi Mandel

From: Lufthansa Customer Relations <customer.relations@lufthansa.com>
Sent: Tuesday, July 13, 2021 4:35 PM
To: Naomi Mandel
Subject: Your Feedback to Lufthansa, FB ID 34989700

Dear Professor. Horovitz,

Thank you for emailing our Management on June 11, 2021. We understand that you have been waiting for quite some time for your case to be handled. Please accept our renewed apologies for your inconvenience and for the delay in the handling of your request.

We regret to hear that our service center staff did not meet your expectations. The situation described certainly does not meet the high standards Lufthansa sets for customer service.

It is our aim to be there for our passengers at all times, not only when they are our guests on board or at the airport. Our service centers should always be a knowledgeable and competent point of contact for you. Your satisfaction is the criteria by which our work is measured. Lufthansa has developed exceptionally high standards for the selection and training of our staff which are intended to ensure the highest levels of professionalism and friendliness.

Therefore, we apologise for the situation you experienced, and thank you for bringing it to our attention. This provides us with an opportunity to investigate the root causes and ensure that your experience remains an exception.

We hope that you will give us the opportunity to provide you with an entirely positive Lufthansa experience in the future.

Sincerely,
M. Mausio

For your information:

- Please make sure to always include our eight digit Feedback ID if you are answering to our correspondence. You can find the Feedback ID in the subject of this email.

Attachments 29-32: Photos showing a sample of our seat assignments with no extra legroom





Attachments 33-34: A sample of actual extra legroom seats on our flights (not assigned to us). The second photo shows a baby bassinet attached to the wall.



Attachment 35: Photo taken on July 25 of the closed customer service desk at Frankfurt airport. The alternative desks were a large distance away from our gates.k



Certificate of Service

I hereby certify that I have, this 5 day of June caused a copy of the foregoing Complaint to be served by electronic mail on the following persons:

Arthur Molins, Esq.

arthur@lufthansa.com

Kimberly Graber, Esq.


kimberly.graber@dot.gov

Blane Workie, Esq.

blane.workie@dot.gov

Robert Gorman, Esq.

robert.gorman@dot.gov

A handwritten signature in cursive script that reads "Naomi Horovitz". The signature is written in dark ink and is positioned above a horizontal line.

Naomi M. Horovitz